

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZUCHAER & ZUCHAER CONSULTING LLC,

Plaintiff,

-against-

PROJECT VERTE INC.,

Defendant.

20-cv-8703-VM

**STIPULATION OF
VOLUNTARY DISMISSAL
PURSANT TO FRCP
41(a)(1)(A)(ii).**

PROJECT VERTE INC.

Counterclaim-Plaintiff

-against-

ZUCHAER & ZUCHAER CONSULTING, LLC, MOSHE
ZUCHAER, JOSSEF KAHLON, and TNJ HOLDINGS,
INC.

Counterclaim-Defendants

STIPULATION OF DISMISSAL

To The Honorable Victor Marrero, United States District Judge:

Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii) and Fed. R. Bankr. P. 7041, and in accordance with the terms of that certain court-approved Settlement and Release Agreement, the parties to this action hereby stipulate that in this action: on the one hand, (i) Zuchaer & Zuchaer Consulting LLC and Moshe Zuchaer's (together, "Zuchaer") claims against Project Verte Inc. ("Debtor") and (ii) Debtor's counterclaims against Zuchaer shall be dismissed with prejudice; and, on the other hand, (iii) Debtor's counterclaims against Jossef Kahlon ("Kahlon") and TNJ Holdings,

Inc. (“TNJ”) and (iv) Kahlon and TNJ’s counterclaims against Debtor shall be dismissed without prejudice, all such dismissals without costs, and with the parties waiving all rights of appeal. For the avoidance of doubt, this Stipulation of Dismissal shall in no way be construed as a waiver or release of any other claims or causes of action held by the Debtor’s Chapter 7 estate against any of the parties to this action.

Dated: February 9, 2024

Respectfully submitted,

Alfred T. Giuliano, in his capacity as chapter 7 trustee for the estate of Project Verte Inc.

By his counsel:



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